

Walker G. Harman, Jr. [WH-8044]
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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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VERONICA ROBLEDO, Individually And On Behalf Of
All Other Persons Similarly Situated,

12 CV 3579 (ALC)(DCF)

related to

12 CV 6111 (ALC)(DCF)

**PLAINTIFFS' NOTICE OF
MOTION FOR
PRELIMINARY OR
CONDITIONAL
COLLECTIVE ACTION
CERTIFICATION (NOTICE
TO POTENTIAL
COLLECTIVE ACTION
MEMBERS)**

No. 9 PARFUME LEASEHOLD,
LAURICE & CO. UPTOWN, INC.,
LAURICE WASHINGTON LTD.,
LAURICE & BLEECKER CORP.,
LAURICE SOUTHAMPTON, INC.,
LAURICE MADISON LTD., and
LAURICE RAHME, Individually,

Defendants.

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PLEASE TAKE NOTICE THAT, upon the annexed Declaration of Walker G. Harman, Jr., dated September 5, 2013, and the exhibits attached thereto, the Affidavit of Veronica Robledo, sworn to on August 2, 2012, and the Supplemental Affidavit of Veronica Robledo, sworn to August 28, 2013, the Memorandum of Law in Support of Plaintiffs' Motion, and upon all prior pleadings and proceedings herein, the Plaintiffs will move this Court, before the Honorable Andrews L. Carter, Jr., United States District Judge, United States District Court for the Southern District of New York, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, at a date and time to be determined by the Court, for an Order:

- (i) Directing Defendants to disclose the names and last known address of all current and former employees who worked as retail sales employees at the Defendants' retail stores in New York State within the statutory time period (*i.e.* three (3) years from the date of dissemination of court-authorized notice);
- (ii) Authorize that notice be sent, pursuant to 29 U.S.C. § 216(b), to all similarly situated employees (retail sales employees at Defendants' retail stores in New York State) advising them of their right to join or opt into this action, and assert claims under the Fair Labor Standards Act, 29 U.S.C. §§ 201 *et seq.* Plaintiffs propose that the notice be written, in a form approved by the Court, and have attached a proposed notice as *Exhibit A* to the Declaration of Walker G. Harman, Jr.; and
- (iii) For such further relief as this Court may deem just and proper.

Dated: New York, New York
September 5, 2013

Respectfully submitted by:
THE HARMAN FIRM, PC
Counsel for Plaintiffs

s/
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